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September 29, 2017

VIA ECF

Hon. Cheryl L. Pollack
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East,
Brooklyn, New York 11201

Re: Aragonez v. City of New York
16-CV-1794 (ARR)(CLP)

Your Honor:

I represent Defendant New York City Police Officer Kareem Phillips in the above-referenced matter. I write jointly on behalf of counsel for all parties to request an extension of time to complete fact discovery from the present deadline October 4th, 2017 to October 20th, 2017.

Since the parties were last before Your Honor for a status conference this Tuesday, September 26th, 2017, we renewed discussions regarding settlement. Given the current fact discovery deadline, the parties will be unable to exhaust the possibility of settlement in advance of conducting the outstanding depositions. The parties' respectfully request an enlargement of time to complete fact discovery in an effort to resolve this matter without incurring further costs and attorney's fees in connection with the remaining depositions.

As such, the parties respectfully request an enlargement of time to complete fact discovery from October 4th, 2017 to October 20th, 2017.

Furthermore, if Your Honor is inclined to grant this request and the Court's schedule permits it, the parties respectfully request a settlement conference before Your Honor prior to the close of discovery.

We thank the Court for its time and consideration of this matter.

Respectfully Submitted,

_____/s/_____
Doug LaBarbera (DL 3880)

CC: **VIA ECF**

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